



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 8, 2025

By ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Veliz Martinez v. Genalo*, No. 24-cv-8675 (KPF)

Dear Judge Failla:

This Office represents the government in the above-referenced habeas corpus action. The government's deadline to file its opposition to petitioner's motion to enforce was July 7, 2025. The government's opposition was filed at 12:14 a.m. on July 8, 2025, *i.e.*, fifteen minutes late. I write respectfully to request that the Court grant the government a *nunc pro tunc* extension of its deadline to file the opposition such that the government's opposition is deemed timely filed. Petitioner's counsel consents to this request. Due to unexpected technological issues that occurred when I was finalizing the brief shortly before the filing deadline, including a several-minute freeze of my computer while the Word document was converting to a PDF document, ultimately requiring a restart of my computer, I did not complete the government's filing until 12:14 a.m., fifteen minutes past the 11:59 p.m. deadline.

I apologize to the Court and the petitioner for the short delay in the filing of the government's papers, and I thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Brandon M. Waterman
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cc: Counsel of Record (by ECF)

Application GRANTED. The Government's deadline to file its opposition to petitioner's motion is hereby ADJOURNED *nunc pro tunc* to **July 8, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 25.

Dated: July 8, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE